

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2018-321-E

In re: Application of Duke Energy Carolinas, LLC for Approval of Proposed Electric Transportation Pilot and An Accounting Order to Defer Capital and Operating Expenses)	
)	
)	
)	PETITION TO INTERVENE
)	
)	
)	

The South Carolina Coastal Conservation League (“CCL”) and Southern Alliance for Clean Energy (“SACE”) (collectively, the “Conservation Groups”) respectfully petition the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned docket pursuant to R.103-825 of the Commission’s rules of practice and procedure. In support of this petition, Petitioners state as follows:

1. Duke Energy Carolinas, LLC (“DEC”) filed an application with the Commission on October 10, 2018 to establish an Electric Transportation Pilot Program.
2. This Petition to Intervene is timely filed, as the Commission has not yet established an intervention deadline for this proceeding.
3. The South Carolina Coastal Conservation League (“CCL”) is a nonprofit organization whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in their communities by working with individuals, businesses and government to ensure balanced solutions. CCL supports the development of energy policy that is in the public interest of South

Carolínians. CCL has members from across the State, including members who receive electricity service from DEC and will be impacted by the decisions made in this proceeding regarding electric transportation program design, availability, and cost recovery. The address of CCL's main office is 328 East Bay Street, Charleston, SC 29402.

4. Southern Alliance for Clean Energy ("SACE") is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. SACE and its members are interested in promoting greater reliance on clean energy resources to meet the South's energy needs. Like CCL, SACE has members from across the State, including members who receive electricity service from the Company and will be impacted by the decisions made in this proceeding regarding electric transportation program design, availability, and cost recovery. The principal address of SACE is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina and South Carolina.

5. The Conservation Groups have participated as intervenors in multiple Commission proceedings relating to South Carolina renewable energy programs, including those related to implementation of the South Carolina Distributed Energy Resource Program Act, such as the 2014 generic Net Metering docket, Docket No. 2014-246-E; DER Program Design dockets, Nos. 2015-53-E, 2015-54-E, and 2015-55-E; and DEC's annual fuel cost and DERP cost recovery proceedings since 2016.

6. The Conservation Groups and their members have direct and substantial interests that will be impacted by the decisions made in this proceeding

regarding the electric transportation pilot program design, availability, and cost recovery, and their interests cannot be adequately addressed by any other party. The Conservation Groups' position in this proceeding is to support programs that will reduce pollution and result in cleaner, safer, and healthier communities for all South Carolinians. The Conservation Groups' support for these policies and involvement in this proceeding will promote their members' interests as well as the broader public interest. Petitioning to intervene in this proceeding is also consistent with the Commission's policies encouraging maximum public participation in the issues before it.

7. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, the Conservation Groups are represented by counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 22nd day of October, 2018.

s/Stinson W. Ferguson
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Attorney for Petitioners South Carolina

*Coastal Conservation League and
Southern Alliance for Clean Energy*

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In re: Application of Duke Energy)	
Carolinas, LLC for Approval of)	
Proposed Electric Transportation)	
Pilot and An Accounting Order to)	CERTIFICATE OF SERVICE
Defer Capital and Operating)	
Expenses)	

I certify that the following persons have been served with a copy of the *Petition to Intervene* by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

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This the 22nd day of October, 2018.

s/ Lauren Fry
Lauren Fry
Southern Environmental Law Center